

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

Franklin K. McCarty  
Debtor

Case No. 1:23-bk-01722-HWV  
Chapter 13

MOTION TO EXTEND TIME  
FOR FILING ALL REMAINING DOCUMENTS

AND NOW, this 11<sup>th</sup> day of August, 2023, come the above Debtor, by his counsel, CGA Law Firm, Lawrence V. Young, Esquire and files the within Motion averring that:

1. The within Motion is brought pursuant to Bankruptcy Rule 1007 in that it seeks to extend the time in which the Debtor must file all remaining documents.
2. The above-captioned case is was filed as an emergency voluntary Chapter 13 petition on July 28, 2023.
3. The Debtor is experiencing difficulties obtaining pay invoices from his previous employer, which has resulted in a delay of the Debtor's ability to compile and provide all of the information necessary for Counsel to prepare schedules and statements.
4. For the reasons, the Debtor respectfully request an extension until September 11, 2023 to file all outstanding documents.

Respectfully submitted,  
CGA Law Firm

By: /s/ Lawrence V. Young  
Lawrence V. Young, Esquire  
Sup. Ct. ID No. 21009  
135 N. George St. York, PA 17401  
Telephone: 717-848-4900  
(Counsel for Debtor)

CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2023, a true and correct copy of the foregoing Motion to Extend Time for all remaining documents was or will be sent to the following by CM / ECF:

Office of the U.S. Trustee

Jack N. Zaharopoulos, Esquire,  
Chapter 13 Trustee

/s/ Lawrence V. Young  
Lawrence V. Young, Esquire

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**ORDER GRANTING MOTION TO EXTEND TIME TO  
FILE ALL REMAINING DOCUMENTS**

AND NOW, upon consideration of the Motion filed by the Debtor seeking to have the time in which to file all remaining documents extended, it is hereby

ORDERED that the time within which the Debtor must file all remaining documents be extended an additional thirty (30) days.

BY THE COURT,